GRAND JURY—QUALIFICATION OF JUROR.—MASON V. STATE, 53 So., 153 (ALA.).—*Held,* that one who has been a butcher, shedding the blood of animals, with its sight and smell, for seventeen years, is not disqualified from serving on a grand jury in a murder trial.

The right of a party charged with an indictable offense to an impartial grand jury is as unconditional as his right to any jury whatever. *State v. Gillick,* 7 Ia., 287. A juror may be challenged to the favor when he is not altogether indifferent, or might unconsciously be swayed to one side. 1 *Chitty's Criminal Law,* Sec. 544. Such a challenge is a question of fact, to be determined by triers, or by the court, the triers being waived and the issue submitted. *Schoeffler v. State,* 3 Wis., 823. By statute the judge may take the place of the triers. *Licett v. The State,* 23 Ga., 57; *State v. Knight,* 43 Me., 11; *U. S. Rev. Stat.,* 2nd ed. Sec. 819. It is a good cause of challenge that a juror has expressed an opinion as to which party ought to prevail. *The Justices v. Road Co.,* 15 Ga., 39; *Stewart v. The State,* 13 Ark., 720. But the fact that a man is a member of a political party, and a strong partisan, does not affect his qualification as a grand juror. *United States v. Eagan,* 30 Fed., 608. Nor is a juror disqualified because he is a member of the same fraternal organization as plaintiff. *Reed v. Peacock,* 123 Mich., 244.

MASTER AND SERVANT—FELLOW SERVANTS—STREET RAILWAY MOTORMEN.—MILTON'S ADM'X V. FRANKFORT & U. TRACTION CO., 129 S. W., 322 (KY.).—*Held,* that motormen of colliding cars of a street railway system, though employed by the same company, are not fellow servants so as to preclude a recovery by one from the company for injuries caused by the negligence of the other in the course of their employment.

All who serve the same master, deriving authority and compensation from the same source, and are engaged in the same general business are fellow servants. *Wonder v. Balto & Ohio R. R. Co.,* 32 Md., 411. The determining question is whether the servant causing the injury did so in discharge of a duty owed to the common master. *American Telephone and Telegraph Co. v. Bower,* 20 Ind. App., 32. And it is generally held that the crew of one train are the fellow servants of the crew of another train running on the same road. *Baldwin on American Railroad Law,* 252; *Oakes v. Mase,* 165 U. S., 363. However, the rule that a master is not responsible to one of its servants for an injury inflicted from the neglect of a fellow servant is not adopted to its full extent in some states. *Railway Co. v. Keary,* 3 Ohio St., 201; *Louisville and Nashville Railroad Co. v. Collins,* 2 Duvall, 114. The Supreme Court adopted the modified rule in *Chicago and Milwaukee Railroad v. Ross,* 112 U. S., 377, but later reversed this decision. *New England Railway Co. v. Conroy,* 175 U. S., 343.

MORTGAGES—FORGED MORTGAGE—ESTOPPEL.—ROTHSCHILD ET AL. V. TITLE GUARANTEE & TRUST CO., 124 N. Y. SUP. 442.—*Held,* that, where A, after discovering that her son had forged her name to a mortgage, without fraudulent intent and without any design to shield her son, had made two